

1 BRANDON E. WOOD
2 Nevada State Bar Number 12900
3 NEVADA ASSOCIATION SERVICES, INC.
4 6625 S. Valley View Blvd. Suite 300
5 Las Vegas, NV 89118
6 Telephone: (702) 804-8885
7 Facsimile: (702) 804-8887
8 Email: brandon@nas-inc.com
9 *Attorney for Defendant Nevada Association*
10 *Services, Inc.*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE BANK OF NEW YORK MELLON FKA
THE BANK OF NEW YORK AS TRUSTEE
FOR THE REGISTERED HOLDERS OF
THE CWABS, INC., ASSET-BACKED
CERTIFICATES, SERIES 2005-13,

Plaintiff,

vs.

NORTHGATE HOMEOWNERS
ASSOCIATION; NEVADA ASSOCIATION
SERVICES, INC.; MARIA LOYO-
MORALES; KIMBERLY TIBONI; DOES 1-
10, inclusive,

Defendant.

MARIA LOYO-MORALES, an individual,

Counter-Claimant,

vs.

THE BANK OF NEW YORK MELLON FKA
THE BANK OF NEW YORK AS TRUSTEE
FOR THE REGISTERED HOLDERS OF
THE CWABS, INC., ASSET-BACKED
CERTIFICATES, SERIES 2005-13,

Counter-Defendant.

CASE NO.: 2:16-cv-02400-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR NEVADA
ASSOCIATION SERVICES, INC. TO
FILE A RESPONSIVE PLEADING TO
DEFENDANT MARIA LOYO-MORALES'
ANSWER TO COMPLAINT [ECF NO. 1],
COUNTERCLAIM AND CROSSCLAIM**

(First Request)

MARIA LOYO-MORALES, an individual,
Cross-Claimant,
vs.

NORTHGATE HOMEOWNERS
ASSOCIATION; NEVADA ASSOCIATION
SERVICES, INC.; KIMBERLY TIBONI, an
individual,
Cross-Defendants.

STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

(First Request)

The parties respectfully submit the following Stipulation to allow Defendant NEVADA ASSOCIATION SERVICES, INC. (hereinafter "Defendant") thirty (30) additional days to file a responsive pleading to Cross-Claimant's (hereinafter "Cross-Claimant"), Complaint filed on July 26, 2022 [ECF No. 100].


Defendant has tendered defense to Northgate Homeowners Association and is awaiting the response. Pursuant to Stipulation of the parties, Defendant shall have until Friday, September 23, 2022, to file a responsive pleading.

This is the parties' first request for an extension. This request is not made to cause delay or prejudice to any party.

DATED this 23rd day of August, 2022.

NEVADA ASSOCIATION SERVICES, INC.

CORY READE DOWS AND SHAFER

By: 
BRANDON E. WOOD
Nevada State Bar Number 12900
6625 S. Valley View Blvd., Suite 300
Las Vegas, Nevada 89118
*Attorney for Defendant Nevada
Association Services, Inc.*

By: /s/R. Christopher Reade
R. CHRISTOPHER READE
Nevada State Bar Number 06791
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Attorney for Maria Loyo-Morales

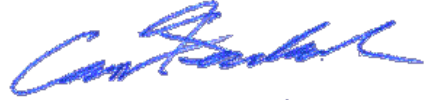
AKERMAN, LLP

By: /s/Scott R. Lachman
ARIEL E. STERN
Nevada State Bar No. 08276
NATALIE WINSLOW
Nevada State Bar No. 12125
SCOTT R. LACHMAN
Nevada State Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
*Attorneys for The Bank of New York
Mellon*

ORDER OF EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

IT IS HEREBY ORDERED that the response to the Complaint is due on or before
September 23, 2022.

IT IS SO ORDERED.



UNITED STATES ~~DISTRICT~~ JUDGE
Case No. 2:16-cv-02400-MMD-VCF
MAGISTRATE

DATED: 8-25-2022

Susan Moses

From: Chris Reade <creade@crdslaw.com>
Sent: Monday, August 22, 2022 1:56 PM
To: Susan Moses; scott.lachman@akerman.com
Cc: Brandon Wood
Subject: RE: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

You may add my electronic signature.



CORY READE DOWS & SHAFER
ATTORNEYS AT LAW

R. Christopher Reade, Esq.
CORY READE DOWS & SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
(702) 794-4411
Fax: (702) 794-4421

DEBT COLLECTION NOTICE: This communication is or may be an attempt to collect a debt, and any information used may be used for that purpose. However, if you are in bankruptcy or have been discharged in bankruptcy, this communication is for informational purposes only and is not intended as an attempt to collect a debt or as an act to collect, assess, or recover all or any portion of the debt from you personally.

CONFIDENTIALITY NOTICE: This electronic message is intended to be viewed only by the individual or entity to whom it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this communication is strictly prohibited without our prior permission. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or if you have received this communication in error, please notify us immediately by return e-mail and delete the original message and any copies of it from your computer system.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

From: Susan Moses <susanm@nas-inc.com>
Sent: Monday, August 22, 2022 1:54 PM
To: Chris Reade <creade@crdslaw.com>; scott.lachman@akerman.com
Cc: Brandon Wood <brandon@nas-inc.com>
Subject: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

Good afternoon:

Enclosed please find Stipulation and Order to Extend time for Nevada Association Services, Inc. to file a Responsive Pleading to Defendant Maria Loyo-Morales' Answer to Complaint [ECF No. 1], Counterclaim and Crossclaim for your review. Let me know if you have and questions, changes or if I am authorized to use your e-signature. The Response is currently due on August 24, 2022. We would like to get this on file as soon as possible. Thank you and have a great rest of the day.

Susan E. Moses

Paralegal and Custodian of Records
Nevada Association Services, Inc.
6625 South Valley View Blvd.
Suite 300
Las Vegas, Nevada 89118
www.nas-inc.com
702/901-2382 Cell
702/901-4372 Direct Office
702/804-8885 Front Desk
702/804-8887 Facsimile

Our office hours are Monday – Thursday 9-5, Friday 9-4:30 and closed for lunch from 12-1 daily. There is a drop-box available for payments in front of our office during normal business hours and lunch.



PERSONAL AND CONFIDENTIAL: Nevada Association Services, Inc. is a debt collector. Nevada Association Services, Inc. is attempting to collect a debt. Any information obtained will be used for that purpose. This message originates from Nevada Association Services, Inc. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, or is otherwise protected against unauthorized use or disclosure. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. Personal messages express only the view of the sender and are not attributable to Nevada Association Services, Inc.

Susan Moses

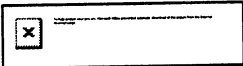
From: scott.lachman@akerman.com
Sent: Monday, August 22, 2022 1:56 PM
To: Susan Moses; create@crdslaw.com
Cc: Brandon Wood; natalie.winslow@akerman.com; brienne.siriwan@akerman.com
Subject: RE: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF
Attachments: SAO to Extend Time to Respond_First Request_2 16-cv-02400.pdf

Brandon/Susan – Okay to use my e-signature on the stipulation. Re Tiboni

Scott Lachman

Partner, Consumer Financial Services, Data and Technology (CFS+) Practice Group
Akerman LLP | 1635 Village Center Circle, Suite 200 | Las Vegas, NV 89134
D: 702 634 5021 | C: 702 321 7282
Scott.Lachman@akerman.com

vCard | Profile



CONFIDENTIALITY NOTE: The information contained in this transmission may be privileged and confidential, and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Susan Moses <susanm@nas-inc.com>
Sent: Monday, August 22, 2022 1:54 PM
To: Chris Reade <create@crdslaw.com>; Lachman, Scott (Ptnr-Las) <scott.lachman@akerman.com>
Cc: Brandon Wood <brandon@nas-inc.com>
Subject: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

[External to Akerman]

Good afternoon:

Enclosed please find Stipulation and Order to Extend time for Nevada Association Services, Inc. to file a Responsive Pleading to Defendant Maria Loyo-Morales' Answer to Complaint [ECF No. 1], Counterclaim and Crossclaim for your review. Let me know if you have and questions, changes or if I am authorized to use your e-signature. The Response is currently due on August 24, 2022. We would like to get this on file as soon as possible. Thank you and have a great rest of the day.

Susan E. Moses

Paralegal and Custodian of Records
Nevada Association Services, Inc.
6625 South Valley View Blvd.
Suite 300
Las Vegas, Nevada 89118

www.nas-inc.com

702/901-2382 Cell

702/901-4372 Direct Office

702/804-8885 Front Desk

702/804-8887 Facsimile

Our office hours are Monday – Thursday 9-5, Friday 9-4:30 and closed for lunch from 12-1 daily. There is a drop-box available for payments in front of our office during normal business hours and lunch.



PERSONAL AND CONFIDENTIAL: Nevada Association Services, Inc. is a debt collector. Nevada Association Services, Inc. is attempting to collect a debt. Any information obtained will be used for that purpose. This message originates from Nevada Association Services, Inc. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, or is otherwise protected against unauthorized use or disclosure. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. Personal messages express only the view of the sender and are not attributable to Nevada Association Services, Inc.